

**Small Business Administration**

**Privacy Impact Assessment**

**For**

**SBA MAINFRAME-EAGAN**

**August 2005**

## Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the \_\_\_\_\_ System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

\_\_\_\_\_ The document is accepted.

\_\_\_\_\_ The document is accepted pending the changes noted.

\_\_\_\_\_ The document is not accepted.

---

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

---

System Manager  
Michael E. Avant

---

DATE

---

OCIO/Project Representative  
Michael E. Avant

---

DATE

---

Program/Office Head  
David Sawyer

---

DATE

---

OCIO  
Ethel Matthews

---

DATE

---

Chief FOI/PA  
Lisa J. Babcock

---

DATE

---

Senior Official for Privacy  
Delorice P. Ford

---

DATE

**Name of Project: SBA Mainframe-Eagan**

**Program Office: OCIO**

**Project's Unique ID:**

**A. CONTACT INFORMATION:**

**1. Who is the person completing this document?**

Michael E. Avant  
Chief, Accounting System Branch  
Office of Information System Support  
Office of the Chief Information Officer  
PH 202-205-6372  
[michael.avant@sba.gov](mailto:michael.avant@sba.gov)

**2. Who is the system owner?**

David Sawyer  
Director  
Office of Information System Support  
Office of the Chief Information Officer  
PH 202-205-6012  
[david.sawyer@sba.gov](mailto:david.sawyer@sba.gov)

**3. Who is the system manager for this system or application?**

Michael E. Avant  
Chief, Accounting System Branch  
Office of Information System Support  
Office of the Chief Information Officer  
PH 202-205-6372  
[michael.avant@sba.gov](mailto:michael.avant@sba.gov)

**4. Who is the IT Security Manager who reviewed this document?**

Ethel M. Matthews  
Chief Information Security Officer  
Office of the Chief Information Officer  
PH 202-205-6372  
[ethel.matthews@sba.gov](mailto:ethel.matthews@sba.gov)

**5. Did the Chief FOI/PA review this document?**

Lisa J. Babcock  
Director of Freedom of Information  
Office of Hearing & Appeals  
PH 202-401-8203  
[lisa.babcock@sba.gov](mailto:lisa.babcock@sba.gov)

**6. Did the Agency's Senior Office for Privacy review this document?**

Delorice P. Ford  
Senior Agency Official for Privacy  
Office of Hearing & Appeals  
PH 202-205-7340  
[delorice.ford@sba.gov](mailto:delorice.ford@sba.gov)

**7. Who is the Reviewing Official?**

Delorice P. Ford  
Senior Agency Official for Privacy  
Office of Hearing & Appeals  
PH 202-205-7340  
[delorice.ford@sba.gov](mailto:delorice.ford@sba.gov)

**B. SYSTEM APPLICATION/GENERAL INFORMATION:**

- 1. Does this system contain any information about individuals?**
  - (a) Is this information identifiable to the individual? No**
  - (b) Is the information about individual members of the public?**
  - (c) Is the information about employees?**
- 2. What is the purpose of the system/application?**

Hardware and infrastructure support.
- 3. What legal authority authorizes the purchase or development of this system/application?**

**C. DATA in the SYSTEM:**

- 1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?**
- 2. What are the sources of the information in the system?**
  - (a) Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**
  - (b) What Federal agencies are providing data for use in the system?**
  - (c) What State and local agencies are providing data for use in the system?**

- (d) From what other third party sources will data be collected?
- (e) What information will be collected from the employee and the public?

**3. Accuracy, Timeliness, and Reliability**

- (a) How will data collected from sources other than SBA records be verified for accuracy?
- (b) How will data be checked for completeness?
- (c) Is the data current?
- (d) Are the data elements described in detail and documented?

**D. ATTRIBUTES OF THE DATA:**

- 1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?
- 2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?
- 3. Will the new data be placed in the individual's record?
- 4. Can the system make determinations about employees/public that would not be possible without the new data?
- 5. How will the new data be verified for relevance and accuracy?
- 6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?
- 7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?
- 8. How will the data be retrieved?
- 9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?
- 10. What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to

particular uses of the information (other than required or authorized uses and how individuals can grant consent.)

**E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:**

1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?
2. What are the retention periods of data in this system?
3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?
4. Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?
5. How does the use of this technology affect public/employee privacy?
6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.
7. What kinds of information are collected as a function of the monitoring of individuals?
8. What controls will be used to prevent unauthorized monitoring?
9. Under which Privacy Act systems of records notice does the system operate? Provide number and name.
10. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

**F. ACCESS TO DATA:**

1. Who will have access to the data in the system?
2. How is access to the data by a user determined?
3. Will users have access to all data on the system or will the user's access be restricted?
4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?
5. Are contractors involved with the design and development of the system

**and will they be involved with the maintenance of the system?**

- 6. Do other systems share data or have access to the data in the system? If yes, explain.**
- 7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?**
- 8. Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?**
- 9. How will the data be used by the other agency?**
- 10. Who is responsible for assuring proper use of the data?**